

May 6th, 2016

Florida Public Service Commission
Office of Commission Clerk
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

REDACTED

RE: 2nd Data Request for Docket No. 160016-TX - Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC - CONFIDENTIAL TREATMENT REQUESTED

To Whom It May Concern:

Enclosed please find a manila envelope marked "CONFIDENTIAL" containing one original copy of Integrated Path Communications, LLC's Responses to **2nd Data Request for Docket No. 160016-TX questions 44 and 50** which are being filed in conjunction with **2nd Data Request for Docket No. 160016-TX - Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC** within the State of Florida.

The Applicant hereby requests confidential treatment for its responses to **2nd Data Request for Docket No. 160016-TX questions 44 and 50**, due to competitive market reasons, to statutory confidential provisions of Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

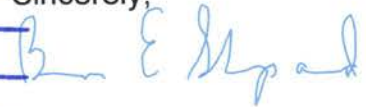
I have enclosed one original copy of each in the manila envelope. There are two edited copies of each where the information claimed as confidential is redacted out, in the response to **2nd Data Request for Docket No. 160016-TX - Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC** section marked "Response: 44 and Response: 50".

Please acknowledge receipt of this filing by returning via email to bshepard@ipc-llc.com or via fax (518-325-1396), the file-stamped extra copy of this cover letter. Also please send the original file-stamped copy in the self-addressed stamped envelope provided for that purpose.

Questions regarding this filing may be directed to Brian Shepard at 518-325-1396 or emailed to filings@ipc-llc.com

- COM _____
- AFD _____
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- ECO _____
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- IDM _____
- TEL _____
- CLK _____

Sincerely,



Brian Shepard
President - Integrated Path Communications, LLC

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COMMISSION CLERK

2nd Data Request for Docket No. 160016-TX

41. Does Integrated Path intend to provide services in Florida that are based on TDM technology? If no, please elaborate.

Response:

Integrated Path intends to provide voice grade telecommunications based on TDM technology in Florida.

42. Does Integrated Path intend to seek universal service support for VoIP services based on an ETC designation provided by the Florida Public Service Commission?

Response:

Integrated Path is not seeking support for VOIP services

43. Does Integrated Path intend to seek universal service support for wireless services based on an ETC designation provided by the Florida Public Service Commission?

Response:

The Florida Public Service Commission does not have the authority to designate a carrier as a wireless ETC. Integrated Path does not seek universal service support for wireless services in Florida.

44. Please review your response to question number 1 in the first data request sent by staff and update as appropriate. We are seeking a comprehensive list of state(s) and federally recognized tribal land(s) in which your company currently offers service (not limited to Lifeline service in tribal lands).

Response:

[REDACTED]

45. Are there any states or federally recognized tribal land(s) for which Integrated Path has received ETC designation, but has not offered services? If yes, please identify all such areas.

Response:

Integrated Path has received authority to provide ETC service to all the tribal areas of Wisconsin. Since Integrated Path was just approved in March 2016, the Company has just started initial marketing campaigns in the state. Integrated Path's Study Area Codes for Wisconsin allow for tribal reimbursement.

46. For all states and federally recognized tribal land(s) identified in the response to questions 43 and 44, please state whether your company has been designated as 1) an eligible

2nd Data Request for Docket No. 160016-TX

telecommunications carrier (ETC) that is eligible for High Cost and Low Income support, or 2) an ETC for Lifeline purposes only.

Response:

Integrated Path is approved as a low income only ETC in the state of Wisconsin with authority to provide telecommunications on the tribal areas in the state.

47. Please review your response to question number 3 in staff's first data request and update as appropriate. In question 3, we are seeking how much universal service support (i.e., High-Cost and Lifeline) your company has received by state and federal recognized tribal land (not limited to Lifeline on tribal lands).

Response:

Integrated Path has not received any High Cost Support to date. The Company has requested High Cost Support in New York as well as Florida.

48. Is Integrated Path currently providing service or seeking authorization to provide service in Iowa and California? If yes, please provide the docket number(s) and, if applicable, associated order(s). If no, please explain the discrepancy with your FCC Lifeline Compliance plan in WC Docket No. 11-42 filed on March 10, 2016 that includes Iowa and California.

Response:

Integrated Path provides wholesale telecommunications services in California and Iowa currently, but has begun to market retail telecommunications services to residential customers in the state.

Iowa Docket Number: DOCKET NO. TCU-2014-0007

California Docket Number: Certificate of Public Convenience and Necessity Decision 15-06-052

49. In response to data request question number 6, Integrated Path states that it is not currently providing retail services in the state of Florida. However, in the Lifeline Compliance Plan (March 10, 2016) filed with the FCC, Integrated Path states that Integrated Path is providing retail and Lifeline services in Florida. Please explain.

Response:

Integrated Path has just started marketing retail services within the state of Florida.

50. In response to data request question number 10, Integrated Path states that Brian Shepard is the sole member and sole owner of Integrated Path. How many employees does Integrated

2nd Data Request for Docket No. 160016-TX

Path have now? Does Integrated Path plan to hire additional employees as the business grows, assuming it is granted the requested designation?

Response:

[REDACTED]

51. Question number 37 of staff's first data request asks if Integrated Path will be using sub-contractors to provide required services. In response to Question number 37, Integrated Path states it would not. How does Integrated Path plan to handle large volumes of customer requests, etc., if there is no third-party assistance? Will Integrated Path have a call center? Please explain.

Response:

Integrated Path will staff based on its current and future needs as it sees necessary. At this time, Integrated Path does not use a call center, but the Company does not rule that out in the future.

52. Please provide a list of all bundles that Integrated Path intends to offer residential customers in Florida.

Response:

Integrated Path is offering one residential home phone package that includes unlimited local and domestic long distance calling plus basic vertical features including call waiting, and caller id.

53. Regarding Integrated Path's response to question number 33, how much is the reconnect fee that Integrated Path charges customers that it passes through from AT&T? Please explain the pass through in more detail. Integrated Path also states that customers could agree to payment plans to bring their accounts current. Does Integrated Path handle the reconnect fee and/or payment plan any differently for retail customers than it does for Lifeline customers? If so, please explain the difference.

Response:

Integrated Path charges \$25 for a reconnect fee that is a pass through from AT&T. When a customer wants to reconnect with Integrated Path, they will be required to pay the reconnect fee prior to re-establishing service and agree to payment plan before service is reconnected. Integrated Path charges the same reconnect fee to non-lifeline customers and non-lifeline customers can be put on a payment plan depending on their payment history.

54. Has Integrated Path received ETC designation in any other state than Wisconsin since the responses from the first data request were sent? Also, has Integrated Path recently applied in any other state(s)? If so, please identify the state(s) and docket number(s).

2nd Data Request for Docket No. 160016-TX

Response:

Integrated Path has not received ETC designation in any other state since the responses from the first data request were sent. Integrated Path has not applied in any other state for ETC designation.

55. Please provide status updates for open dockets for ETC designations in New York and Texas.

Response:

Integrated Path's New York request for expansion of ETC authority in New York is set to be approved by the New York commission in May 2016.
Integrated Path's Texas request for expansion of ETC authority in Texas is currently pending staff approval which is slated for May 2016

56. Has Integrated Path received any federal universal service support from USAC as of April 2016? If yes, how much has Integrated Path received broken down by High Cost and Lifeline?

Response:

Integrated Path has not received any USAC support as of April 2016.

57. Integrated Path mentions in its response to staff's data request question 39 that it would be able to receive High Cost support in rural rate centers where it installs physical infrastructure to provide services to customers. Please provide information regarding the location and type of physical infrastructure Integrated Path has installed.

Response:

Integrated Path currently has a Feature Group D Trunk access via its own facilities switch in Miami Florida with CLLI code MIASFLTTDS1.

58. In its response to staff's first data request question number 40, Integrated Path states that if it were unable to receive High Cost support, it would "limit the investment that Integrated Path would be willing to make in higher cost rural rate centers." Please elaborate on that statement. Would Integrated Path still seek ETC designation in Florida if it could not receive High Cost support?

Response:

Integrated Path would still seek ETC designation in Florida if High Cost support were unavailable, but it would limit the investments the company is willing to make in more rural, higher cost areas.

59. Please review Integrated Path's response to question number 21 in the first data request sent by staff and update as appropriate. Please indicate if Integrated Path has contacted the Seminole tribe. If Integrated Path has made such contacts, please provide the name and contact information along with any documentation that may have been obtained as a result.

2nd Data Request for Docket No. 160016-TX

Response:

Integrated Path has notified the Seminole tribe of its intent to offer local telecommunications services and low income lifeline telecommunications services on the Seminole Tribal Reservation area.